

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

JOHN THIBODEAUX, AMY THIBODEAUX, GABRIELLE THIBODEAUX, AND EMILY THIBODEAUX	*	CIVIL ACTION
PLAINTIFFS	*	NO. 18-501
VERSUS	*	UNASSIGNED DISTRICT JUDGE
J.M. DRILLING, LLC, ADMIRAL INSURANCE COMPANY, ROCKHILL INSURANCE COMPANY, AND BELLSOUTH TELECOMMUNICATIONS, LLC	*	MAGISTRATE JUDGE CAROL B. WHITEHURST
DEFENDANTS	*	

MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

NOW INTO COURT, through undersigned counsel, comes Admiral Insurance Company (“Admiral”), and pursuant to Local Rule 5.7.06 and Rule II of the Administrative Procedures for Filing Documents of the United States District Court for the Western District of Louisiana, hereby moves this Honorable Court for leave to file Admiral’s Exhibit “A” to its Memorandum in Support of Motion to Dismiss Pursuant to Rule 12(b)(1) and 12(b)(6) [Rec.Doc. 54-1], under seal of this Court, so as to protect the confidential, sensitive and proprietary nature of the information contained within said document from disclosure to third-parties and competitors of Admiral’s insured, JM Drilling, LLC, and guard it against any potential harm to its business interests, now, therefore, respectfully moves this Honorable Court for leave to file the attached Exhibit “A” into the court record under seal by order of the Court in the captioned civil action.

Respectfully submitted,

s/ Michael J. Vondenstein

MICHAEL J. VONDENSTEIN

(Louisiana Bar Roll No. 13116)

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COMPANY**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 26, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a copy of same, along with a Notice of Electronic Filing, to all counsel for record.

s/ Michael J. Vondenstein

MICHAEL J. VONDENSTEIN